EXHIBIT 30

## IN THE MARION COUNTY SUPERIOR COURT STATE OF INDIANA CIVIL DIVISION, ROOM TWO

YYONNE ROGERS, Individually and as Executrix of the Estate of Richard Rogers, Deceased,

Plaintiff,

**-** y-

CAUSE NO. 49D02-9301-CT-0008

R. J. REYNOLDS TOBACCO CO., PHILIP MORRIS INCORPORATED, THE AMERICAN TOBACCO CO., LIGGETT GROUP, INC.,

Defendants.

## **VERDICT FORMS**

If you find Plaintiff is entitled to recover damages against the Defendants under the theory of strict liability, then you should proceed to Verdict Form "A" which should be signed and dated by the jury foreperson. If you find in favor of the Plaintiff on the theory of strict liability, you should not consider any additional issues.

If, however, on Plaintiff's theory of strict liability, you find in favor of the Defendants, then you should proceed to Verdict Form "B" which should be signed and dated by the jury foreperson. If you find in favor of the Defendants on the theory of strict liability, you should then proceed to consider whether Plaintiff is entitled to recover damages against the Defendants under the theory of comparative fault.

In considering comparative fault, if you find the Defendants are not at fault, you should proceed to Verdict Form "D" which should be signed and dated by the jury foreperson.

If you find the Defendants were at fault, you should attribute fault as follows:

Percentage of fault attributable to the Defendants		<u> </u>
Percentage of fault attributable to the decedent, Richard Rogers		
	=	100%

If you found that the fault, if any, of the decedent, Richard Rogers, was more than fifty percent (50%) of the total fault that proximately caused the injuries and death of Richard Rogers, you are to find that the Defendants are not liable to the Plaintiff. You should proceed to Verdict Form "D" which should be dated and signed by the jury foreperson.

However, if you found that fault, if any, on the part of the decedent, Richard Rogers, was fifty percent (50%) or less than the total fault proximately causing his injuries and death, and you found that any percentage of fault was attributable to the Defendants, you are to find the Defendants liable to the Plaintiff. You should proceed to Verdict Form "C" which should be dated and signed by the jury foreperson.

## VERDICT FORM "A"

U	n Pla	intiff's	strict lial	oility cl	aim, we, t	he jury, fi	ind for	the Plat	ntiff
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DATE		<del></del>			-	TURY FORFOR	RSON	·	

## VERDICT FORM "B"

On Plaintiff's strict liability claim, we, the jury, find for the Defendants and against the Plaintiff.

8/23/96 DATE